

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: DEEP MARINE HOLDINGS, INC., et al. Debtors.	§ § § § § §	Case No. 09-39313 Jointly Administered Chapter 11
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**KAZEMINY AND CANDIES ENTITIES' RESERVATION OF RIGHTS REGARDING
JOINT DISCLOSURE STATEMENT FOR THE DEBTORS' PROPOSED JOINT PLAN
OF REORGANIZATION (Docket # 339)**

TO THE HONORABLE MARVIN ISGUR, UNITED STATES BANKRUPTCY JUDGE:

DCC Ventures, LLC; Triomphe Investors, LLC; NJK Holding Corporation; Nasser Kazeminy; Otto Candies, L.L.C.; Otto Candies, III; and Candies Shipbuilders, LLC (the "Kazeminy and Candies Entities"), parties-in-interest in the above-captioned cases, file this reservation of rights regarding the Joint Disclosure Statement for the Debtors' Proposed Joint Plan of Reorganization (the "Disclosure Statement") filed by the above-captioned debtors (the "Debtors") and state as follows:

1. The Kazeminy and Candies Entities reserve their rights with respect to any objections made by any other parties including any objections that seek to omit from, revise or add disclosures to the Disclosure Statement, and reserve the right to object or respond to any objection raised by any other parties in interest. They reserve their right to object to any additional changes made to the Disclosure Statement, Plan,¹ the exhibits thereto or other related documents, including the Plan Supplement, prior to the hearing on the Disclosure Statement. They further reserve their rights to object to (a) the allocation of the DIP Facility Claim and

¹ Defined terms that used but not defined herein shall have the meanings set forth in the Debtors' Plan of Reorganization.

overhead/case administration costs amongst DMT, DM1, DM2, DM3, and DM4 and (b) Section 10.05 of the Disclosure Statement's pass-through provision. The Kazeminy and Candies Entities also reserve their rights with respect to any objections to the form or substance of any other provisions of the Plan and related documents, including but not limited to the Plan Supplement.

WHEREFORE, premises considered, the Kazeminy and Candies Entities hereby reserve their rights, and ask that they be granted such other and further relief to which they show themselves entitled.

Dated: Houston, Texas
April 26, 2010

Respectfully submitted,

BAKER BOTTS L.L.P

/s/ Tony M. Davis

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and CANDIES SHIPBUILDERS, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this, the 26th day of April, 2010, true and correct copies of foregoing pleading were served *via* the ECF system on the parties on the ECF service list and *via* First Class United States mail, postage prepaid, on the following:

Debtors

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Deep Marine Technology Incorporated
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Deep Marine 2, LLC
Deep Marine 3, LLC
Deep Marine 4, LLC
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